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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

NEETA THAKUR, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

) Case No. 25-cv-4737

) **STIPULATION AND [PROPOSED] ORDER**
) **FOR BRIEFING SCHEDULE AND HEARING**
) **FOR PLAINTIFFS' MOTION FOR A**
) **TEMPORARY RESTRAINING ORDER AND**
) **CLASS CERTIFICATION MOTION**

) Judge: Hon. Rita F. Lin

STIPULATION AND [PROPOSED] ORDER FOR BRIEFING SCHEDULE AND HEARING FOR PLAINTIFFS' MOTION
FOR A TEMPORARY RESTRAINING ORDER AND CLASS CERTIFICATION MOTION
CASE NO. 25-CV-4737

Pursuant to Civil Local Rule 7-12, Plaintiffs and Defendants (“the Parties”), through their respective undersigned counsel, stipulate and agree to a briefing schedule and hearing date in this case as follows.

1. On June 4, 2025, Plaintiffs’ filed the present case. On June 5, Plaintiffs filed a motion for a temporary restraining order seeking, on behalf of themselves and those similarly situated, “an immediate temporary restraining order enjoining Defendants from cutting off grantees’ access to congressionally appropriated funding that agencies have already awarded; restoring such previously awarded grants; requiring Defendants to provide no-cost extensions to grantees of restored grants for the time necessary to resume and complete interrupted work; enjoining Defendants from undertaking similarly unlawful actions to terminate duly awarded Agency grants in future; and requiring Defendants to return to the lawful orderly and individualized grant administration procedures they employed pursuant to federal regulations prior to January 20, 2025.” ECF No. 7-1 at 2. Plaintiffs filed a motion for class certification that same day. ECF No. 18.
2. On June 6, 2025, the Court issued an order setting forth two possible schedules for briefing Plaintiffs’ pending motions and advising the Parties to be prepared to discuss their positions on expedited fact discovery. ECF No. 20. The Court further set a status conference for June 9 at 11:00am to discuss the two schedules and the Parties’ views of expedited fact discovery.
3. The parties conferred via email on June 5 and have subsequently conferred following the Court’s order. The Parties propose the following schedule:
 - a. Defendants’ opposition to both motions to be due on June 12, 2025;
 - b. Plaintiffs’ replies to be due on June 17, 2025;
 - c. A hearing on June 20, 2025 at 10:00 a.m.
4. Counsel for the parties have conferred and agreed to the requests described herein.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the

1 Parties, subject to the Court's approval, that the Court shall issue an order providing for the relief
2 requested in paragraph three above.

3 Respectfully submitted,

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6 Acting Assistant Attorney General
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9 ERIC J. HAMILTON
10 Deputy Assistant Attorney General

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14 /s/ Jason Altabet

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Dated: June 9, 2025

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PURSUANT TO STIPULATION, IT IS SO ORDERED,

Dated: _____

Hon. Rita F. Lin

ATTESTATION

Pursuant to Local Rule 5-1(i), I attest that I am the ECF user whose user ID and password are being used in the electronic filing of this document, and further attest that I have obtained the concurrence in the filing of the document from the other signatory.

/s/ Jason Altabet